

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

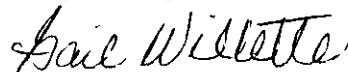
Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
FOLLOW-UP INTERROGATORY TO
UNITED STATES POSTAL SERVICE
(OCA/USPS-103)
October 30, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request for production of documents. Instructions included with OCA interrogatories 1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by reference.

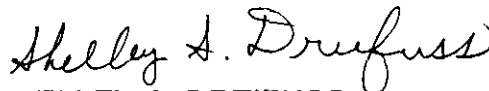
Respectfully submitted,



GAIL WILLETTE

Director

Office of the Consumer Advocate



SHELLEY S. DREIFUSS

Attorney

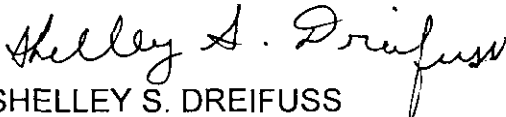
OCA/USPS-103. Please refer to the United States Postal Service Response to OCA/USPS-48, filed October 24, 1997 ("Response"). Attachment 1 to the Response shows that for FY 1996, FIM Letter Volume was 7,769,287,000. Please note that First-Class Single-Piece Letter Volume as shown in the CRA Statistics by Class of Mail is 54,150,759,000.

- a. Confirm that Attachment 1 to the Response shows *First Class* FIM volumes. If not confirmed, please explain.
- b. Is it correct to say that 14.3% of First-Class letters are FIM-tagged? (7,769,287,000 divided by 54,150,759,000.) If not, please provide the correct percentage and show the derivation thereof.
- c. Please explain the difference between the 14.3% figure and the 12.51% figure used by witness Fronk (T-32) in his direct testimony, n.16, at 42, to derive his estimate of 6,800 million pieces of courtesy reply envelope mail in Test Year 1998.
- d. The 12.51% figure used by witness Fronk refers to "Stamped and Metered FIM." Please clarify what is meant by the term "Stamped and Metered FIM." Does the term include courtesy reply envelopes provided to a household by businesses such as utilities, mailed by a household, and to which a stamp is affixed by the household?
- e. Please refer to the Rebuttal Testimony of A. Joseph Alexandrovich in Docket No. MC95-1, at 28 (Tr. 36/16321). Table 1 on that page shows a First-Class Single-Piece FIM Letter-Shaped Volume of 5,829,649,144. Does this 5,829,649,144 figure identify the same type of FIM volume

identified as FY 1996 FIM Letter Volume of 7,769,287,000, as set forth in Attachment 1 to the Response? If not, please provide an updated FY 1996 figure.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


SHELLEY S. DREIFUSS
Attorney

Washington, D.C. 20268-0001
October 30, 1997